

**TROY LAW, PLLC**

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342

41-25 Kissena Boulevard, Suite 119, Flushing, NY 11355

May 15, 2023

**Via Email**

Avrohom Y. Gefen

3000 Marcus Avenue, Suite 1E9

Lake Success, NY 11042

[agefen@vmmlegal.com](mailto:agefen@vmmlegal.com)

Attorney for Defendants JJW Enterprises, Inc, and Benjamin Wai

Louisa Wu/Paul W. Siegert

3808 Union Street, Suite 9a

New York, NY 10013

[louisawu@wulawgroup.com](mailto:louisawu@wulawgroup.com)

[paulsiegert@aol.com](mailto:paulsiegert@aol.com)

Re: 1:21-cv-00873 *Wu et al v. JJW Enterprises, Inc. et al*

Dear Counsel,

We write to serve Defendants in the matter captioned above with the following in connection with Plaintiffs Motion for Leave to File First Amended Complaint, as Described Below:

1. Plaintiffs Motion for Leave to File First Amended Complaint:
  - a. Notice of Motion for Leave to File First Amended Complaint,
  - b. Declaration of John Troy in Support of Motion for Leave to File First Amended Complaint, and
  - c. Plaintiffs' Memorandum of Law in Support of Motion for Leave to File First Amended Complaint; along with Exhibits 1 through 4.

In accordance with Your Honorable James R. Cho Order dated April 26, 2023, regarding Plaintiffs' Motion for Leave to File First Amended Complaint, Defendants shall serve reply papers, if any, no later than June 12, 2023. By July 3, 2023, the motions will be fully-briefed.

Respectfully submitted,  
TROY LAW, PLLC

/s/ John Troy

John Troy

*Attorney for Plaintiffs*

cc: via ECF

all counsel of record

/rr